

UNITED STATES DEPARTMENT OF JUSTICE
OFFICE OF THE UNITED STATES TRUSTEE
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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

_____	:	Case No. 14-23412 (NLW)
In re	:	Chapter 7
	:	
Michael Moshe Cohen,	:	The Honorable Novalyn L. Winfield
	:	
	:	Hearing Date: November 10, 2014, at 10:00 a.m.
Debtor.	:	
_____	:	ORAL ARGUMENT IS WAIVED UNLESS OPPOSITION FILED

**CERTIFICATION OF JAMES J. STIVES IN SUPPORT OF MOTION BY THE UNITED
STATES TRUSTEE FOR AN ORDER EXTENDING TIME TO FILE A MOTION TO
DISMISS CASE UNDER 11 U.S.C. § 707(b)(1) AND (3) AND EXTENDING TIME TO
FILE A COMPLAINT OBJECTING TO DISCHARGE UNDER 11 U.S.C. § 727
TO DECEMBER 8, 2014**

The United States Trustee, by and through counsel, in furtherance of her duties and responsibilities under 28 U.S.C. § 586(a)(3) and (5), hereby respectfully moves for an Order Extending Time to File a Motion to Dismiss Case Under 11 U.S.C. § 707(b)(1) and (3) and Extending Time to File a Complaint Objecting to Discharge Under 11 U.S.C. § 727 to December 8, 2014.

In support of this Motion, I, James J. Stives, Paralegal Specialist of the Office of the United States Trustee, Region 3, of full age, hereby certify as follows:

1. The docket for this case reflects that Michael Moshe Cohen (“the Debtor”) filed a voluntary pro-se petition (“the Petition”) for relief under chapter 7 of title 11 of the United States Code on June 30, 2014.

2. The docket further reflects that Steven P. Kartzman, Esq. was appointed as the interim chapter 7 trustee on July 2, 2014, and a meeting of creditors pursuant to 11 U.S.C. § 341(a) was scheduled to be held on August 8, 2014.

3. Following the independent review by the Office of the United States Trustee (“OUST”) with respect to the Debtor’s petition, schedules and statement of financial affairs, the OUST identified issues that warranted further investigation of the Debtor’s financial records.

4. For instance, Schedule F of the Petition lists unsecured claims totaling \$106,096,741.95.

5. Contemporaneous with the filing of this instant motion, the United States Trustee, by and through counsel, is formulating initial discovery.

6. The Debtor will automatically be issued a discharge upon expiration of the last day to object to discharge on October 7, 2014. As entry of the discharge would render any motion to dismiss or any complaint objecting to discharge ineffectual, the United States Trustee, by and through counsel, respectfully requests that the deadline for filing a motion to dismiss case under 11 U.S.C. § 707(b) or a complaint objecting to discharge under 11 U.S.C. § 727 be extended to and including December 8, 2014.

7. The United States Trustee, by and through counsel, reserves her rights without prejudice to seek any additional extensions of time for good cause shown.

I, hereby, certify that the foregoing statements made by me are true and I acknowledge that if any of the foregoing statements are willfully false I may be subject to punishment.

By: /s/ James J. Stives
James J. Stives
Paralegal Specialist

DATED: October 7, 2014